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March 18, 2021

By ECF

Honorable Robert W. Lehrburger
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 1007

Re: *Milan Heggs v. The City of New York et al.*, 18-CV-9709 (RA) (RWL)

Dear Magistrate Judge Lehrburger:

I am the Assistant Corporation Counsel assigned to represent Defendants in the above-referenced action. I write with Plaintiff's consent to request (1) an extension of time for the parties to meet and confer to discuss Plaintiff's request for complaints/demands regarding wheelchair accessibility issues from March 19 to March 26, 2021; (2) an extension of time for the parties to submit a proposed revised case management schedule from March 24 to March 29, 2021; and (3) an extension of time for all Defendants to respond to the Amended Complaint to April 16, 2021.

Following a conference before Your Honor on March 10, 2021, the parties were ordered to meet and confer to identify a reasonable narrowing of Plaintiff's request for complaints/demands concerning wheelchair accessibility issues. *See* Dkt No. 95. I am continuing to speak with Defendants to gather additional information that would assist the parties during this meet and confer. As such, I respectfully request an extension of the deadline to hold this meet and confer by one week, until March 26, 2021.

In light of the requested extension of time to meet and confer, Defendants also request until March 29, 2021 for the parties to submit a proposed case management plan to the Court. The requested extension will allow the parties to account for the outcome of the parties' meet and confer held the week before.

Finally, Plaintiff filed an Amended Complaint on March 17, 2021 naming four new defendants. Plaintiff's counsel has confirmed that they intend to serve the new defendants within the next week. For those Defendants currently represented by the New York City Law Department, their time to respond to the Amended Complaint is March 31, 2021. To allow me time to conduct representation interviews of the newly-named and yet-to-be-served defendants, as well as prepare and file a single response to the Amended Complaint on behalf of all Defendants represented by the Law Department, I respectfully request an extension of all Defendants' deadline to respond to the Amended Complaint from March 31 to April 16, 2021. In short, on April 16, 2021, I would file a single response to the Amended Complaint on behalf of all defendants represented by the Law Department.

Again, Plaintiff's counsel, Rebecca Pattiz, consents to these requests.

Accordingly, Defendants request (1) an extension of time for the parties to meet and confer to discuss Plaintiff's request for complaints/demands regarding wheelchair accessibility from March 19 to March 26, 2021; (2) an extension of time for the parties to submit a proposed revised case management schedule from March 24 to March 29, 2021; and (3) an extension of time for all defendants to respond to the Amended Complaint to April 16, 2021.

Thank you for your consideration of these requests.

Respectfully submitted,

s/
Carolyn Kruk

cc: (by ECF)
Rebecca Pattiz
David Rankin
Attorneys for Plaintiff

SO ORDERED:
3/18/2021



HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE